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May 23, 2018

Graham v. Prince et al., No. 1:15-cv-10160-SHS (S.D.N.Y.)  
McNatt v. Prince, et al., No. 1:16-cv-08896-SHS (S.D.N.Y.)

Dear Judge Stein:

This Firm represents Plaintiffs Donald Graham and Eric McNatt in the above-captioned actions. Pursuant to the Court's Individual Practice 1(E), we write to request an extension of the remaining expert discovery deadlines set forth in the Court's Revised Scheduling Order dated December 1, 2017 (Dkt. 77). This is Plaintiffs' first request for an extension of the expert discovery deadlines, and all Defendants consent to this request.

Specifically, Plaintiffs request that: the deadline for responsive expert reports, currently May 25, 2018, be extended to June 8, 2015; the deadline for rely expert reports, currently June 8, 2015, be extended to June 29, 2018; and the deadline for completing expert depositions, currently June 29, 2018, be extended to July 31, 2018. The other dates set forth in the Revised Scheduling Order have been completed and, therefore, would not be affected by the grant of the extensions sought herein.

Respectfully submitted,



Adam I. Rich

Hon. Sidney H. Stein  
U.S. District Court, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
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VIA ECF

Copies to: Counsel of Record

VIA ECF